

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No. 4:13 CR00222 JAR (SPM)
)
THOMAS ZELL,)
)
Defendant.)

GOVERNMENT'S REQUEST FOR DISCOVERY

Comes now the United States of America by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Erin Granger, Assistant United States Attorney for said District, and requests that the defense provide the following discovery pursuant to Rules 16 and 26 of the Federal Rules of Criminal Procedure:

1. Copies of or the right to inspect and copy or photograph any books, papers, documents, photographs, tangible objects, or copies or portions thereof, which are within the possession, custody, or control of the defendant and which the defendant intends to introduce as evidence in its case at trial.
2. Copies of or the right to inspect and copy or photograph any results or reports of physical or mental examinations and of scientific tests or experiments made in connection with the particular case, or copies thereof, within the possession or control of the defendant, which the defendant intends to introduce as evidence in its case at trial or which were prepared by a witness whom the defendant intends to call at trial when the results or reports relate to that witness' testimony.

3. A written summary of testimony the defense intends to use under Rules 702, 703 or 705 of the Federal Rules of Evidence, including the opinions of such witnesses, the bases therefore, and the witness' qualifications.

4. Copies of all statements of any defense witness that relate to the subject matter to which the witness will testify.

Respectfully submitted,

RICHARD G. CALLAHAN
United States Attorney

s/ Erin Granger
ERIN GRANGER, #53593MO
Assistant United States Attorney
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(314) 539-2200

CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2013, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

s/ Erin Granger
ERIN GRANGER, #53593MO
Assistant United States Attorney